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Attorneys for Petitioner
YOU LIN WANG

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

YOU LIN WANG, an individual
Petitioner,

V.

RICHARD KAHN, an individual; and FORENSIC PROFESSIONALS GROUP USA, INC., a Florida corporation; and DEREK LONGSTAFF, an individual.

Respondents.

Case No.: 5:20-cv-08033-BLF

**PETITIONER YOULIN WANG'S
[PROPOSED] ORDER REGARDING
SCHEDULING MATTERS**

1 Petitioner Youlin Wang (“Wang”) respectfully submits his proposed schedule of
2 deadlines for this matter, including deadlines for discovery and expert disclosures.

3 The Court’s May 5, 2022, Case Management Order directed the parties “to meet,
4 confer, and submit a stipulation and order setting all deadlines not set by the Court below,
5 including discovery cut-offs and expert disclosure deadlines,” by May 27, 2022.

6 Wang is, unfortunately, unable to submit a stipulation. The meet and confer process
7 has been challenging.

8 During the May 4, 2022, Case Management Conference, Mr. Douglas Klein, counsel of
9 record for respondents Richard Kahn (“Kahn”) and Forensic Professionals Group USA, Inc.
10 (“FPG,” and together with Kahn, the “Kahn Respondents”), informed the Court that he
11 intended to seek leave to withdraw as counsel for the Kahn Respondents. Mr. Klein further
12 advised the Court that he intended to file a motion within days.

13 For reasons that we do not understand, no motion has been filed. Our understanding is
14 that Kahn wishes to represent himself. Yet nothing has been filed to effect a substitution even
15 as to Kahn.

16 Wang’s counsel could not immediately engage Kahn in meet and confer efforts
17 because he is a represented party. Wang’s counsel only recently received written permission
18 from Mr. Klein to communicate with Kahn. Wang’s counsel was able to meet and confer with
19 Kahn regarding scheduling a telephonic ADR conference. Wang’s counsel also advised Kahn
20 that he would be circulating a proposed schedule and stipulation for discussion. Wang’s
21 counsel subsequently circulated a proposal (with the dates reflected herein) and received no
22 response from either Kahn or Mr. Klein. Kahn mentioned a plan to take some vacation time
23 and that may explain his lack of response.

24 In an effort to comply with the Court’s order, Wang is submitting his own proposed
25 schedule. Given the April 10, 2023, trial date, it is important that the case get back on track.
26 The schedule includes a deadline for the Kahn Respondents to Answer the Petition. During
27 the Case Management Conference, the Court instructed Mr. Klein that the Kahn Respondents

1 must file their Answers within 14 days of the Case Management Conference. That did not
 2 happen. Should the Kahn Respondents fail to file an Answer within any further deadline
 3 ordered by the Court, Wang intends to initiate default proceedings. The schedule also includes
 4 a deadline for the Kahn Respondents to provide their initial disclosures. The parties had
 5 agreed to serve initial disclosures on February 17, 2021, which Wang did. The Kahn
 6 Respondents, however, have still not served theirs.

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Event	Date
Respondents' Deadline To Serve Answer	June 10, 2022
Respondents' Deadline To Serve Initial Disclosures Under FRCP 26 (Petitioner Has Already Served)	June 10, 2022
Non-expert discovery cut-off	August 26, 2022
Serve written expert reports	September 2, 2022
Serve supplemental/rebuttal expert reports	September 22, 2022
Expert discovery cut-off	September 29, 2022
Last day to file dispositive motions	October 13, 2022
Oppositions to dispositive motions	November 3, 2022
Replies to dispositive motions	November 17, 2022
Dispositive motions (hearing date)	December 1, 2022
Final Pretrial Conference	March 2, 2023
Trial	April 10, 2023

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1 Respectfully Submitted,

2 Dated: May 27, 2022

GRELLAS SHAH LLP

4 By: /s/ Dhaivat H. Shah
5 Dhaivat H. Shah
6 Attorneys for Petitioner

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9 **[PROPOSED] ORDER**

10 The above ~~[PROPOSED]~~ ORDER REGARDING SCHEDULING MATTERS is
11 approved and all parties shall comply with its provisions. In addition, the Court makes the
12 further orders stated below:

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17 Dated: May 31, 2022

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19 BETH LABSON FREEMAN
20 United States District Judge